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*WowWee USA, Inc.*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

WOWWEE GROUP LIMITED, WOWWEE  
CANADA, INC. and WOWWEE USA, INC.,

*Plaintiffs*

v.

MEIRLY, MEMO, MENGAN MAKER, MEN'S  
FASHION SHOES STORE, MILANOOPANDA,  
MISS MOON, MOONLIGHTLOVER, MOST TIME,  
NECESSARYCLOTHING, NEW FASHION  
PRODUCT TOY, NEWPAGE0, NICE DEAL SHOP,  
OCEANSTARS, OVERSEE, PACENTO OFFICAL  
SHOES STORE, PARDARG, PENCILCASE,  
PPBAO, QINGCHUNANGRAN,  
QINGYANGXINXIU, QINSHI, QUENTIN TIN,  
RELL MAIL, RFHNGMTRTNJJTED,  
ROMANTICSHOPPING,  
ROSEWHOLESALEBUYING, RUN-RABBIT,  
SC888999, SDFGH, SEXY WOMEN DRESS,  
SHENZHEN YURIY TRADING CO., LTD.,  
SHENZHENXINSHIDAIDIANZISHANGWUDIAN,  
SHOPSTYLE, SMARTWEICONG, SONG789,  
SUMMERDANCE, SUMMERDEAL, SUNSHINE

**CIVIL ACTION No.  
18-cv-706 (AJN)**

**NOTICE OF PLAINTIFFS'  
MOTION FOR DEFAULT  
JUDGMENT AND A  
PERMANENT INJUNCTION**

ONON, SUPERLLV, THE GIRL TO HEAVEN,  
THE MOST ROMANTIC THING, THEBAY, TIAN  
MA KE JI, TIANHONGYIHUA, TOBEST2016,  
TOMORROWSUNSHINEE, TOPBUAUTY,  
TSUNEYO MACHINERY ACCESSORIES, TVG,  
VALUEQUALITYANDSERVICE, WANELOLIFE,  
WANTINGTING233, WARM COCOA COFFEE,  
WENSHUIXIANG, WH, WINDLYFLY, WOO  
CHANT, WORLD TRADING COMPANY,  
WORLDMAKEUP, WUMANNA, XIAOFENG001,  
XIAOXIANGZI418, XINGYUEXIAOBAODIAN,  
YANGRONGXXMM@163.COM, YANGTTE,  
YAYABB STORE, YIKUKUNANZHUANG,  
YIQIUMEI, YIWUTENGYUE, YJ STYLISH  
STORE, YJNFNHY, YOYO003, YUGUIHAI,  
YUTAO, Z\_LIVING, ZDSS, ZHANGMINGHAO,  
ZHANGSHAOPING85, ZHANGWEM3,  
ZHANGYAZI, ZHANGYILIN66, ZHI JIA DAILY  
NECESSITIES and ZSJ,

*Defendants*

**TO ALL PARTIES AND THEIR COUNSEL OF RECORD HEREIN:**

**NOTICE IS HEREBY GIVEN** that pursuant to the Court’s May 11, 2018 Scheduling Order and May 15, 2018 Order Extending Plaintiffs’ Time to File, and in accordance with Your Honor’s Individual Rules of Practice, the Court’s Individual Local Civil Rule 55.2(b) and Federal Rule of Civil Procedure 55(b)(2), Plaintiffs WowWee Group Limited, WowWee Canada, Inc. and Plaintiff WowWee USA, Inc. (collectively, “WowWee” or “Plaintiffs”) by and through its undersigned counsel, move for default judgment and a permanent injunction (“Motion for Default Judgment”) against the following Defendants: Meirly, Men's fashion shoes store, Miss Moon, Most time, New Fashion Product Toy, NewPage0, Pacento Offical Shoes Store, pardarg, pencilcase, ppbao, rfhngmtrtnjted, Run-rabbit, sc888999, sexy women dress, Shenzhen Yuriy Trading Co., Ltd., shenzhenxinshidaidianzishangwudian, smartweicong, SONG789, summerdance, superllv, TIAN MA KE JI, tobest2016, Tsuneyo machinery accessories, TVG,

Valuequalityandservice, Warm cocoa coffee, wenshuixiang, wh, windlyfly, Woo Chant, worldmakeup, wumanna, Xiaofeng001, xiaoxiangzi418, yangrongxxmm@163.com, yiwutengyue, YJ Stylish store, yjfnfhy, z\_living, ZDSS, zhangshaoping85, zhangyazi, zhangyilin66, Zhi jia daily necessities and ZSJ (collectively hereinafter referred to as “Defaulting Defendants”).

The Motion for Default Judgment is based upon the Declaration of Mary Kate Brennan in support of Plaintiffs’ Motion for Default Judgment, the Certificate of Service of the Summons and Complaint, the Certificate of the Clerk of the Court stating that no answer has been filed in this Action by Defaulting Defendants and upon all prior pleadings and proceedings herein.

Dated: June 28, 2018

Respectfully submitted,

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